

September 2, 2014

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: Ex Parte Communication in WC Docket Nos. 09-197 and 11-42**

Dear Secretary Dortch:

On August 28, 2014, the Consumer and Governmental Affairs Bureau (CGB) issued a Public Notice<sup>1</sup> that emphasized precisely why the Wireline Competition Bureau should approve Prepaid Wireless Retail's (d/b/a Odin Mobile) Compliance Plan, thus allowing Odin Mobile to offer Lifeline service to blind Americans.

The Public Notice invited comment on "Tentative Findings About the Accessibility of Communications Technologies for the 2014 Biennial Report Under the Twenty-First Century Communications and Video Accessibility Act." In a paragraph titled "Accessibility Gaps," the Tentative Findings provide that "[o]f particular concern" are the "complaints that many wireless phones that are being made available to low-income consumers who are blind or visually impaired by providers that participate in the Commission's Lifeline program either lack certain accessibility features, or are not accessible at all." *Id.* ¶25. The Findings further state that "[a]pproximately 15% of all informal complaints and RDAs received during the reporting period involved complaints about inaccessible wireless handsets received in conjunction with subscriptions for telephone services under the Commission's Lifeline program." *Id.* ¶ 39.


Odin Mobile wants to participate in Lifeline so that it can make its accessible handsets available to low-income blind Americans. Unfortunately, despite meetings, letters and the support of blind organizations, such as the Blinded Veterans Association, the American Council of the Blind and Perkins Products (an affiliate of the Perkins School for the Blind), Odin Mobile's compliance plan, which was filed in December 2012, has not yet been approved.

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<sup>1</sup> Public Notice, CG Docket No. 10-213 (August 28, 2013).

The solution to the "Accessibility Gap" identified by the CGB has been known for *almost two years*, and is within the Commission's exclusive control: approve Odin Mobile's Compliance Plan, and designate it an eligible telecommunications carrier in the federal default states.

Regards,

A handwritten signature in black ink that reads "Robert Felgar". The signature is written in a cursive style with a large, stylized "F" and a long horizontal stroke at the end.

Robert Felgar  
General Manager